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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

KEITH COLLIER,

Defendant.

Case: 5:15-cr-20774  
Judge: O'Meara, John Corbett  
MJ: Grand, David R.  
Filed: 12-03-2015 At 04:29 PM  
INDI USA V. COLLIER (NA)

VIOLATIONS: 18 U.S.C. § 922(g)(1)  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 924(c)

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**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

*(18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)*

On or about May 21, 2015, in the Eastern District of Michigan, Southern Division, the defendant, KEITH COLLIER, after having previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year (felony offense), did knowingly and unlawfully possess firearms, that is, one Smith and Wesson MP .40 caliber handgun and one Glock 21 .45 caliber handgun, said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

*(21 U.S.C. § 841(a)(1) – Possession With Intent to Distribute a Controlled Substance (Heroin)*

On or about May 21, 2015, in the Eastern District of Michigan, Southern Division, the defendant, KEITH COLLIER, did knowingly and intentionally possess with the intent to distribute 100 grams or more of a mixture or substance containing a detectible amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**

*(21 U.S.C. § 841(a)(1) – Possession With Intent to Distribute a Controlled Substance (Cocaine)*

On or about May 21, 2015, in the Eastern District of Michigan, Southern Division, the defendant, KEITH COLLIER, did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectible amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOUR**

*(18 U.S.C. § 924(c) – Possessing a Firearm in Furtherance of a Drug Trafficking Crime)*

On or about May 21, 2015, in the Eastern District of Michigan, Southern Division, the defendant, KEITH COLLIER, did knowingly possess a firearm or firearms, that is, one Para-Ordnance P-10.45 .45 caliber handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States; specifically, the drug trafficking crimes alleged in Counts Two and Three of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT FIVE**

*(18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)*

On or about May 21, 2015, in the Eastern District of Michigan, Southern Division, the defendant, KEITH COLLIER, after having previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year (felony offense), did knowingly and unlawfully possess a firearm, that is, one Para-Ordnance P-10.45 .45 caliber handgun, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**

*(18 U.S.C. § 924(d) – Firearms and Ammunition Forfeiture)*

The allegations contained in Counts One and Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense set forth in Count Three of this Indictment, the defendant, KEITH COLLIER, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the knowing commission of the offense(s).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson  
Grand Jury Foreperson

BARBARA L. McQUADE  
United States Attorney

s/ Kevin M. Mulcahy  
Kevin M. Mulcahy  
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s/ Andrew J. Lievense  
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Dated: December 3, 2015

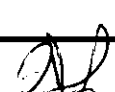
United States District Court  
Eastern District of Michigan

**Criminal Case C**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> 

**Case Title:** USA v. Keith Collier

**County where offense occurred :** Wayne and Oakland

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

\_\_\_ Indictment/\_\_\_ Information --- no prior complaint.  
☒ Indictment/\_\_\_ Information --- based upon prior complaint [Case number: ] 15-mj-30495  
 \_\_\_ Indictment/\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Original case was terminated; no additional charges or defendants.  
☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

December 3, 2015  
Date

s/ Andrew J. Lievense  
 ANDREW J. LIEVENSE  
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